

Pro Se I (Rev. 12/16) Complaint for a Civil Case

## UNITED STATES DISTRICT COURT

for the

District of

Nevada

Division

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OCT 25 2022

CLERK US DISTRICT COURT  
DISTRICT OF NEVADA

BY:

DEPUTY

2:22-cv-01784-RFB-VCF

Justin Goddard Jarecki

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Amazon

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Jury Trial: (check one) ☒ Yes ☐ No

## COMPLAINT FOR A CIVIL CASE

## I. The Parties to This Complaint

## A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Justin Goddard Jarecki

Street Address

6201 E. Lake Mead BLVD Unit 207

City and County

Las Vegas, NV

State and Zip Code

Nevada 89156

Telephone Number

702-640-8868

E-mail Address

Olympia.work@hotmail.com

## B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

## Defendant No. 1

Name  
Job or Title *(if known)*  
Street Address  
City and County  
State and Zip Code  
Telephone Number  
E-mail Address *(if known)*

Amazon LAS2  
3837 Bay Lake Trail  
North Las Vegas, Clark County  
Nevada 89030  
888-280-3321

## Defendant No. 2

Name  
Job or Title *(if known)*  
Street Address  
City and County  
State and Zip Code  
Telephone Number  
E-mail Address *(if known)*

Amazon  
410 Terry Avenue North  
Seattle, King County  
Washington 98109  
888-288-4331

## Defendant No. 3

Name  
Job or Title *(if known)*  
Street Address  
City and County  
State and Zip Code  
Telephone Number  
E-mail Address *(if known)*

Amazon LAS7  
6001 E. Tropical Pkwy  
North Las Vegas  
Nevada 89115

## Defendant No. 4

Name  
Job or Title *(if known)*  
Street Address  
City and County  
State and Zip Code  
Telephone Number  
E-mail Address *(if known)*

**II. Basis for Jurisdiction**

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (check all that apply)



Federal question



Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

**A. If the Basis for Jurisdiction Is a Federal Question**

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

Civil Rights Act of 1866

**B. If the Basis for Jurisdiction Is Diversity of Citizenship****1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, (name) Justin Goddard Jarecki, is a citizen of the State of (name) Nevada.

**b. If the plaintiff is a corporation**

The plaintiff, (name) Amazon, is incorporated under the laws of the State of (name) Washington, and has its principal place of business in the State of (name) Nevada.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

**2. The Defendant(s)****a. If the defendant is an individual**

The defendant, (name) \_\_\_\_\_, is a citizen of the State of (name) \_\_\_\_\_. Or is a citizen of (foreign nation) \_\_\_\_\_.

b. If the defendant is a corporation

The defendant, (name) \_\_\_\_\_, is incorporated under the laws of the State of (name) \_\_\_\_\_, and has its principal place of business in the State of (name) \_\_\_\_\_.  
Or is incorporated under the laws of (foreign nation) \_\_\_\_\_, and has its principal place of business in (name) \_\_\_\_\_.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

Asking the court for \$180,000,000 in punitive damages against the Defendant in total with the breakdown of \$100,000,000 in punitive damages Against Amazon. Punitive damages of \$40,000,000 against Amazon LAS2 facility. Punitive damages against Amazon LAS7 facility for \$40,000,000.

### III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

For over 2.5 years I Justin Goddard Jarecki was a Tier 1 Employee with Amazon including working at Amazon LAS7 facility and Amazon LAS2 facility my civil rights were and is violated with in regards to Discrimination, Racist Remarks and Comments, Bullying, Harrassment, endangerment of my safety. 12-17-2020 Amazon LAS7 refuses to give me any interviews, apply for job advancement promotion even with all my qualifications as a Learning Ambassador with more responsibilities but 0 advance in pay or above a Tier 1 employee, 8-17-2021 Amazon LAS2 was calling me Sick and not feeling well for not making production by my superior. Im asian this is incredibly racist and discrimination as well as 0 career advancement.

IV. Relief State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Amazon - \$100,000,000.00 in Punitive Damages for violating my civil rights and violating Civil Rights Act of 1866  
Amazon LAS2 facility - \$40,000,000.00 in Punitive damages for violating my civil rights and violating Civil Rights Act of 1866  
Amazon LAS7 facility - \$40,000,000.00 in Punitive damages for violating my civil rights and violating Civil Rights Act of 1866

Amazon is the Employer i worked for they did nothing when i filed complaints.

**V. Certification and Closing**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

**A. For Parties Without an Attorney**

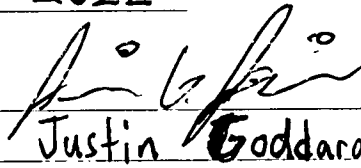
I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing:

10-25-2022

Signature of Plaintiff

Printed Name of Plaintiff

Justin Goddard Jarecki**B. For Attorneys**

Date of signing:

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address